

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11	
Legacy IMDBS, Inc., <i>et al.</i> , <sup>1</sup>	Case No. 23-10852 (KBO)	
Debtors.	Jointly Administered	
Synacor, Inc.,		
Plaintiff,	Adversary Proceeding No. 23-50753 (KBO)	
v.		
IV Media, LLC; Innovation Ventures, LLC; Portal Acquisition Co.; iMedia Brands, Inc.; ValueVision Interactive, Inc.; VVI Fulfillment Center, Inc.; ValueVision Retail Inc.; JWH Acquisition Company; PW Acquisition Company, LLC; EP Properties, LLC; FL Acquisition Company; Norwell Television, LLC; 867 Grand Avenue, LLC; and Unidentified Parties, 1-25,		
Defendants.		

**STIPULATION FOR EXTENSION OF TIME TO  
RESPOND TO COMPLAINT FOR DECLARATORY JUDGMENT**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff Synacor, Inc. and Defendants IV Media, LLC and Innovation Ventures, LLC (together, the “Defendants”) that Defendants’ time within which they must respond to the *Complaint for Declaratory Judgment*

---

<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: ValueVision Media Acquisitions, Inc. (8670); Legacy IMBDS, Inc. (3770); ValueVision Interactive, Inc. (8730); Portal Acquisition Company (3403); VVI Fulfillment Center, Inc. (5552); ValueVision Retail Inc. (2155); JWH Acquisition Company (3109); PW Acquisition Company, LLC (0154); EP Properties, LLC (3951); FL Acquisition Company (3026); Norwell Television, LLC (6011); and 867 Grand Avenue, LLC (2642). The Debtors’ service address is 6740 Shady Oak Road, Eden Prairie, MN 55344-3433.

filed in the above-captioned adversary proceeding is extended through and including January 4, 2024. The Defendants acknowledge the sufficiency of service and service of process.

<p>GIBBONS P.C.</p> <p><u>/s/ Christopher Viceconte</u></p> <p>Christopher Viceconte (No. 5568) Chantelle D. McClamb (No. 5978) 300 Delaware Avenue, Suite 1015 Wilmington, Delaware 19801-1671 Telephone: (302) 518-6300 Email: <a href="mailto:cviceconte@gibbonslaw.com">cviceconte@gibbonslaw.com</a> <a href="mailto:cmcclamb@gibbonslaw.com">cmcclamb@gibbonslaw.com</a></p> <p><i>Counsel for the Plaintiff</i></p> <p>Dated: December 6, 2023</p>	<p>GREENBERG TRAURIG, LLP</p> <p><u>/s/ Dennis A. Meloro</u></p> <p>Dennis A. Meloro (No. 4435) 222 Delaware Avenue, Suite 1600 Wilmington, Delaware 19801 Telephone: (302) 661-7000 Email: <a href="mailto:dennis.meloro@gtlaw.com">dennis.meloro@gtlaw.com</a></p> <p><i>Counsel for the Defendants</i></p> <p>Dated December 6, 2023</p>
---	---